

Comments on the Draft E is for the Yucca Mountain HLW Disposal Facility

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by

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1. I recommend passage of S-1287 as currently written.
2. The NRC is better prepared to produce and regulate the radiation exposure standard for Yucca Mountain than the EPA because of its many years of regulating the safety of spent fuel and other high level material at nuclear power plants.
3. Regardless of who regulates this for Yucca Mountain, I recommend that research occurring in the past few years regarding the health effects of low level radiation exposure be considered. The linear no-threshold hypothesis used to predict health effects from radiation exposure is in error at low levels of exposure. This is in the range generally used to regulate exposure to the public. Solid research has indicated a threshold effect, which also occurs with many toxic chemicals below which the health effect of low level radiation exposure becomes positive. We have long suspected that this occurs by studying the health of radiation workers and people living in areas of the world who receive many times more exposure from natural sources than we do in Ohio. These people show no ill effect and generally their incidence of cancer is less.
4. An article in the paper this morning quoted Mayor White as requesting full disclosure, accurate and complete, regarding risks of transporting nuclear waste. I agree with Mayor White. The following is pertinent:

Many thousands of radioactive waste shipments have been completed in the past 40 plus years. These shipments have a 100% record of ensuring safety to the public. While accidents have occurred, no significant radiation release has ever occurred. The containers were extensively tested to avoid any danger to the public.